

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	
)	Chapter 11
)	
FRANCHISE GROUP, INC., <i>et al.</i> , ¹)	Case No. 24-12480 (LSS)
)	
Debtors.)	(Jointly Administered)
)	

**NOTICE OF ENTRY OF APPEARANCE AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that, pursuant to section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and Rule 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Reed Smith LLP hereby enters its appearance as counsel for STORE Master Funding IV, LLC (“STORE”) in the above-captioned chapter 11 bankruptcy cases (these “Cases”) and requests, pursuant to Bankruptcy Rules 2002 and 9007 and section 1109(b) of the Bankruptcy Code, that it be added to the service lists in the Cases and that copies of all notices,

¹ The Debtors in these chapter 11 cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260), Franchise Group Newco BHF, LLC (4123), Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 2371 Liberty Way, Virginia Beach, Virginia 23456.

motions, pleadings (courtesy copies), subpoenas (courtesy copies), and other papers filed or served in these Cases be served upon counsel at the following addresses:

Jason D. Angelo, Esq.
REED SMITH LLP
1201 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: +1.302.778.7500
Facsimile: +1.302.778.7575
E-mail: jangelo@reedsmith.com

Keith M. Aurzada, Esq.
Dylan T. F. Ross, Esq.
REED SMITH LLP
2850 North Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: +1.469.680.4200
Facsimile: +1.469.680.4299
E-mail: kaurzada@reedsmith.com
E-mail: dylan.ross@reedsmith.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in Bankruptcy Rules 2002, 3017, 4001, 9007, and 9010(b), but also includes, without limitation, any plan of reorganization and objections thereto, notices of any orders, pleadings (courtesy copies), subpoenas (courtesy copies), motions, applications, demands, hearings, requests or petitions, disclosure statements, answering or reply papers, memoranda and briefs in support of any of the aforementioned and any other documents brought before this Court with respect to these Cases, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, e-mail, delivery, telephone, facsimile, or otherwise.

PLEASE TAKE FURTHER NOTICE that nothing in this *Notice of Entry of Appearance and Request for Service of Notices and Papers* (this “Notice”) is intended to, or does, (i) authorize the undersigned to accept service of any subpoena or pleading on behalf of STORE or (ii) waive STORE’s rights to proper formal service pursuant to Bankruptcy Rules 7004, 7005, 9014, or 9016 (and Federal Rules of Civil Procedure 4 and 45) or any other applicable rules or statutes.

PLEASE TAKE FURTHER NOTICE that neither this Notice nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to be a submission to the Bankruptcy Court’s jurisdiction or a waiver of any of the rights of STORE, including, without limitation, to (i) have final orders in noncore matters entered only after *de novo* review by a

District Court judge, (ii) trial by jury in any proceeding so triable in these Cases or any case, controversy, or proceeding related to these Cases, (iii) have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, setoffs, or recoupments to which STORE is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are hereby expressly reserved.

Dated: March 18, 2025
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By: /s/ Jason D. Angelo
Jason D. Angelo (No. 6009)
1201 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: +1.302.778.7500
Facsimile: +1.302.778.7575
E-mail: kgwynne@reedsmith.com
E-mail: jangelo@reedsmith.com

- and -

Keith M. Aurzada, Esq.
Dylan T. F. Ross, Esq.
REED SMITH LLP
2850 North Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: +1.469.680.4200
Facsimile: +1.469.680.4299
E-mail: kaurzada@reedsmith.com
E-mail: dylan.ross@reedsmith.com

Counsel to STORE Master Funding IV, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of March 2025, I caused a copy of the foregoing *Notice of Appearance and Request for Service of Notices and Papers* to be filed and served via ECF Noticing to all parties receiving ECF Notices in these chapter 11 cases.

/s/ Jason D. Angelo
Jason D. Angelo (No. 6009)